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Governor

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

**D & D Brake Sales, Inc.
State Road 234 and Mohawk Road
Fortville, Indiana 46040**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F059-14886-00012	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 25, 2002 Expiration Date: April 25, 2007

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Fortville, Indiana
Permit Reviewer: MH / EVP

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Certification
Emergency/Deviation Occurrence Report
Semi-Annual Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary brake shoe rebuilding and assembly source.

Authorized Individual:	Robert Thompson, Plant Manager
Source Address:	State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address:	P.O. Box 160, Fortville, Indiana 46040
Phone Number:	(317) 485-5177
SIC Code:	3069, 7539
County Location:	Hancock
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) brake liner shot blasting operation, consisting of two (2) Pangborn shot blasters identified as #1 and 2, constructed in 1992, with a total maximum capacity of blasting 1,400 pounds of brake shoes per hour, utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1.
- (b) One (1) brake liner grinding operation, consisting of four (4) grinders identified as # 1, 2, 3, and 4, constructed in 1992, with a total maximum grinding rate of 1,400 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2.
- (c) One (1) brake liner chopping operation, consisting of three (3) deliner choppers, constructed in 1992, with a total maximum throughput capacity of 5,625 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3.
- (d) Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, each with a maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour, as follows:
 - (1) One (1) burnoff oven, constructed in 1992, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through stack ID # 7; and
 - (2) Three (3) bonding ovens, identified as #1, 2, and 3, each constructed in 1992, each with a maximum heat input rate of 0.5 MMBtu per hour, exhausting through stacks # 5, 4, and 6, respectively.
- (b) Vessel storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ, approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) brake liner shot blasting operation, consisting of two (2) Pangborn shot blasters identified as #1 and 2, constructed in 1992, with a total maximum capacity of blasting 1,400 pounds of brake shoes per hour, utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1.
- (b) One (1) brake liner grinding operation, consisting of four (4) grinders identified as # 1, 2, 3, and 4, constructed in 1992, with a total maximum grinding rate of 1,400 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2.
- (c) One (1) brake liner chopping operation, consisting of three (3) deliner choppers, constructed in 1992, with a total maximum throughput capacity of 5,625 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3][326 IAC 2-2][40CFR 52.21]

- (a) Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) emitted from the facilities listed below shall be limited as stated, based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Pangborn shotblast operation (2 shot blasters) controlled by baghouse ID#1	1,400	3.23
Brake liner grinding operation (4 grinders) controlled by baghouse ID#2 & HEPA Filter	1,400	3.23
Deliner chopping operation (3 choppers) controlled by baghouse ID#3	1,875	3.93

Compliance with these limits shall also limit the source-wide potential to emit of PM to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) are not applicable.

- (b) The requirement from CP-059-2477-00012, issued on August 26, 1992, Operating Condition #4, that establishes that particulate matter (PM) emissions shall be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 20% opacity is not applicable because facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).
- (c) The requirement from CP-059-2668-00012, issued on October 21, 1992, Operating Condition #5, that establishes that particulate matter (PM) emissions shall be limited to 0.015 grains per actual cubic feet (gr/acf) at the outlet of the fan discharge for the dust collectors for the grinding and the shotblasting operations and that PM emissions will be considered in compliance with 326 IAC 6-3 provided that visible emissions do not exceed 10% opacity is not applicable. The allowable PM emission rate has been established pursuant to 326 IAC 6-3-2 (Process Operations) and facilities that discharge asbestos have opacity limitation standards pursuant to 326 IAC 14-2-1, (40 CFR 61.140, Subpart M).

D.1.2 PM-10 Emission Limitation [326 IAC 2-8-4][326 IAC 2-2][40CFR 52.21]

PM-10 emitted from the process operation control devices shall be limited as follows:

- (a) The shotblast operation (2 shot blasters) exhausting at baghouse stack ID #1 shall be limited to 4.614 pounds of PM-10 emitted per ton of brake shoes processed. This is equivalent to 3.23 pounds of PM-10 per hour, based on a maximum throughput of 0.7 tons of brake shoes per hour.
- (b) The brake liner grinding operation (4 grinders) exhausting at baghouse and HEPA filter stack ID #2 shall be limited to 4.614 pounds of PM-10 emitted per ton of brake shoes processed. This is equivalent to 3.23 pounds of PM-10 per hour, based on a maximum throughput of 0.7 tons of brake shoes per hour.
- (c) The deliner chopping operation (3 choppers) exhausting at baghouse stack ID #3 shall be limited to 4.192 pounds of PM-10 emitted per ton of brake shoes processed. This is equivalent to 3.93 pounds of PM-10 per hour, based on a maximum throughput of 0.938 tons of brake shoes per hour.

Compliance with these limitations shall limit the source-wide potential to emit of PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable. Compliance with these requirements shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) not applicable to this source.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Asbestos, as a single HAP, emitted from the process operation control devices shall be limited as follows:

- (a) The shotblast operation (2 shot blasters) exhausting at baghouse stack ID #1 shall be limited to 1.628 pounds of asbestos emitted per ton of brake shoes cleaned. This is equivalent to 1.14 pounds of asbestos per hour, based on a maximum throughput of 0.7 tons of brake shoes per hour.

- (b) The deliner chopping operation (3 choppers) exhausting at baghouse stack ID #3 shall be limited to 1.216 pounds of asbestos emitted per ton of brake shoe liners chopped. This is equivalent to 1.14 pounds of asbestos per hour, based on a maximum throughput of 0.938 tons of brake shoes per hour.

Compliance with these limitations shall limit the source-wide potential to emit of a single HAP (as asbestos) to less than 10 tons per twelve (12) consecutive month period. Compliance with this condition shall also limit the source-wide potential to emit of the combined HAPs to less the 25 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable.

D.1.4 National Emission Standards for Asbestos [326 IAC 14-2-1] [40 CFR 61.140]

The following requirements of this subpart shall be met for those facilities that discharge asbestos:

- (a) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.
- (b) Monitor each potential source of asbestos emissions from visible emissions at least once a day.
- (c) Inspect each air cleaning device at least once each week for proper operation.
- (d) Maintain records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.142, Subpart M.
- (e) Furnish upon request and/or making available the records for inspection by OAQ.
- (f) Retain a copy of all monitoring and inspection records for at least two years.
- (g) Submit a copy of the monitoring records if visible emissions occurred during the report period.
- (h) Meet the waste disposal requirements:

40 CFR 61.150 (Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations):

Each owner or operator of any source covered under the provisions of 40 CFR 61.144, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.147 shall comply with the following provisions:

- (1) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (1) (i) through (iv) of this section.

(A) Adequately wet asbestos-containing waste material as follows:

- (i) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and

- (ii) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and
 - (iii) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and
 - (iv) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(2) or 1926.58(k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.
 - (v) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.
- (B) Process asbestos-containing waste material into nonfriable forms as follows:
 - (i) Form all asbestos-containing waste material into nonfriable pellets or other shapes;
 - (ii) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by 40 CFR 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.
- (C) For facilities demolished where the RACM is not removed prior to demolition according to 40 CFR 61.145(c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to 40 CFR 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.
- (D) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in 40 CFR 61.149(c)(2).

- (E) As applied to demolition and renovation, the requirements of paragraph (1) of this section do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.
- (2) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:
 - (A) A waste disposal site operated in accordance with the provisions of 40 CFR 61.154, or
 - (B) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of 40 CFR 61.155.
 - (C) The requirements of paragraph (2) of this section do not apply to Category I nonfriable ACM that is not RACM.
- (3) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 40 CFR 61.149(d)(1) (i), (ii), and (iii).
- (4) For all asbestos-containing waste material transported off the facility site:
 - (A) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:
 - (i) The name, address, and telephone number of the waste generator.
 - (ii) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - (iii) The approximate quantity in cubic meters (cubic yards).
 - (iv) The name and telephone number of the disposal site operator.
 - (v) The name and physical site location of the disposal site.
 - (vi) The date transported.
 - (vii) The name, address, and telephone number of the transporter(s).
 - (viii) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

- (B) Provide a copy of the waste shipment record, described in paragraph (4)(i) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.
 - (C) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
 - (D) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:
 - (i) A copy of the waste shipment record for which a confirmation of delivery was not received, and
 - (ii) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.
 - (E) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.
- (5) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.
- (i) Meet the requirements of Section 61.152 (Air Cleaning) and 61.153 (Reporting). 40 CFR 61.152 (Air-cleaning):
- (1) The owner or operator who uses air cleaning, as specified in 40 CFR 61.142(a), 40 CFR 61.144(b)(2), 40 CFR 61.145(c)(3)(i)(B)(1), 40 CFR 61.145(c)(4)(ii), 40 CFR 61.145(c)(11)(i), 40 CFR 61.146(b)(2), 40 CFR 61.147(b)(2), 40 CFR 61.149(b), 40 CFR 61.149(c)(1)(ii), 40 CFR 61.150(a)(1)(ii), 40 CFR 61.150(a)(2)(ii), and 40 CFR 61.155(e) shall:
 - (A) Use fabric filter collection devices, except as noted in paragraph (ii) of this section, doing all of the following:
 - (i) Ensure that the airflow permeability, as determined by ASTM Method D737-75, does not exceed 9 m³/min/m² (30 ft³/min/ft²) for woven fabrics or 113/min/m²(35 ft³/min/ft²) for felted fabrics, except that 12 m³/min/m² (40 ft³min/ft²) for woven and 14 m³/min/m² (45 ft 3min/ft²) for felted fabrics is allowed for filtering air from asbestos ore dryers; and

- (ii) Ensure that felted fabric weighs at least 475 grams per square meter (14 ounces per square yard) and is at least 1.6 millimeters (one-sixteenth inch) thick throughout; and
 - (iii) Avoid the use of synthetic fabrics that contain fill yarn other than that which is spun.
 - (B) Properly install, use, operate, and maintain all air-cleaning equipment authorized by this section. Bypass devices may be used only during upset or emergency conditions and then only for so long as it takes to shut down the operation generating the particulate asbestos material.
 - (C) For fabric filter collection devices installed after January 10, 1989, provide for easy inspection for faulty bags.
- (2) There are the following exceptions to paragraph (i)(A):
- (A) After January 10, 1989, if the use of fabric creates a fire or explosion hazard, or the Administrator determines that a fabric filter is not feasible, the Administrator may authorize as a substitute the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals (40 inches water gage pressure).
 - (B) Use a HEPA filter that is certified to be at least 99.97 percent efficient for 0.3 micron particles.
 - (C) The Administrator may authorize the use of filtering equipment other than described in paragraphs (i)(A) and (2)(i) and (ii) of this section if the owner or operator demonstrates to the Administrator's satisfaction that it is equivalent to the described equipment in filtering particulate asbestos material.
- (3) 40 CFR 61.153 (Reporting):
- (A) Any new source to which this subpart applies (with the exception of sources subject to 40 CFR 61.143, 40 CFR 61.145, 40 CFR 61.146, and 40 CFR 61.148), which has an initial startup date preceding the effective date of this revision, shall provide the following information to the Administrator postmarked or delivered within 90 days of the effective date. In the case of a new source that does not have an initial startup date preceding the effective date, the information shall be provided, postmarked or delivered, within 90 days of the initial startup date. Any owner or operator of an existing source shall provide the following information to the Administrator within 90 days of the effective date of this subpart unless the owner or operator of the existing source has previously provided this information to the Administrator. Any changes in the information provided by any existing source shall be provided to the Administrator, postmarked or delivered, within 30 days after the change.
 - (i) A description of the emission control equipment used for each process; and:

- (a) If the fabric device uses a woven fabric, the airflow permeability in m³/min/m² and; if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (b) If the fabric filter device uses a felted fabric, the density in g/m², the minimum thickness in inches, and the airflow permeability in m³/min/m².
- (ii) If a fabric filter device is used to control emissions,
 - (a) The airflow permeability in m³/min/m² (ft³/min/ft²) if the fabric filter device uses a woven fabric, and, if the fabric is synthetic, whether the fill yarn is spun or not spun; and
 - (b) If the fabric filter device uses a felted fabric, the density in g/m² (oz/yd²), the minimum thickness in millimeters (inches), and the airflow permeability in m³/min/m² (ft³/min/ft²).
- (iii) If a HEPA filter is used to control emissions, the certified efficiency.
- (iv) For sources subject to 40 CFR 61.149 and 40 CFR 61.150:
 - (a) A brief description of each process that generates asbestos-containing waste material; and
 - (b) The average volume of asbestos-containing waste material disposed of, measured in m³/day (yd³/day); and
 - (c) The emission control methods used in all stages of waste disposal; and
 - (d) The type of disposal site or incineration site used for ultimate disposal, the name of the site operator, and the name and location of the disposal site.
- (v) For sources subject to 40 CFR 61.151 and 40 CFR 61.154:
 - (a) A brief description of the site; and
 - (b) The method or methods used to comply with the standard, or alternative procedures to be used.

- (B) The information required by paragraph (1) of this section must accompany the information required by 40 CFR 61.10. Active waste disposal sites subject to 40 CFR 61.154 shall also comply with this provision. Roadways, demolition and renovation, spraying, and insulating materials are exempted from the requirements of 40 CFR 61.10(a). The information described in this section must be reported using the format of appendix A of this part as a guide.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facilities and their control devices.

Compliance Determination Requirements

D.1.6 Particulate Matter (PM and PM-10) and Asbestos

Pursuant to CP 059-2477-00012, issued on August 26, 1992 and CP 059-2668-00012, issued on October 21, 1992, and in order to comply with D.1.1, D.1.2 and D.1.3, the baghouses for PM, PM-10 and asbestos control shall be in operation at all times when the shot blasting operation (i.e., two (2) Pangborn shot blasters), the brake liner grinding operation (i.e., four (4) grinders), and the deliner chopping operation (i.e., 3 deliner choppers) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

- (a) Visible emissions notations of the shot blasting operation; grinder operation; and deliner chopping operation baghouse stack exhausts (ID Nos. 1, 2 and 3, respectively), shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the respective shot blasting, grinding, and deliner chopping operations, at least once per shift when the shot blasting; grinding; and chopping units are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shot blasting operation (i.e., two (2) Pangborn shot blasters), the brake liner grinding operation (i.e., four (4) grinders), and the deliner chopping operation (i.e., 3 deliner choppers) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the shot blasting, brake liner grinding, and deliner chopping operations stack exhaust once per shift.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
 - (1) Once per shift records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere; and
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (d) Two (2) dip tanks, identified as primary and secondary, each constructed in 1992, with a combined maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at each of the dip tanks shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The requirement from CP-059-2668-00012, issued on October 21, 1992, Operating Condition #5, that establishes that volatile organic compound (VOC) emissions from the secondary dip tank shall be limited to 15 pounds per day is not applicable because the secondary dip tank will only be used if the primary dip tank is not in use. Both tanks shall be subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Compliance Determination Requirements

D.2.2 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific compliance monitoring requirements applicable to these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

There are no specific reporting requirements applicable to these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
FESOP No.: 059-14886-00012

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
FESOP No.: 059-14886-00012

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: D & D Brake Sales, Inc.
Source Address: State Road 234 and Mohawk Road, Fortville, Indiana 46040
Mailing Address: P.O. Box 160, Fortville, Indiana 46040
FESOP No.: 059-14886-00012

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP)**

Source Background and Description

Source Name: D & D Brake Sales, Inc.
Source Location: State Road 234 and Mohawk Road, Fortville, Indiana 46040
County: Hancock
SIC Code: 3069, 7539
Operation Permit No.: 059-14886-00012
Permit Reviewer: Michael Hirtler / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from D & D Brake Sales, Inc. relating to the operation of a brake shoe rebuilding and assembly source.

History

D & D Brake Sales, Inc. was issued Part 70 Permit No. 059-9982-00012 on June 26, 2000. While the Part 70 permit reflected controlled source emission rates below the Part 70 applicability thresholds, the source opted to obtain a Part 70 permit. However, the source has decided to make a transition from their existing Part 70 permit to a FESOP, pursuant to 326 IAC 2-7-22, and shall achieve FESOP compliance through the continued utilization of existing emissions controls and compliance methods. There are no other changes to the source associated with this approval request. The source shall continue to comply with Part 70 Permit No. T059-9982-00012 until this FESOP No. 059-14886-00012 is issued. This FESOP will replace the existing Part 70 in its entirety upon approval.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) brake liner shot blasting operation, consisting of two (2) Pangborn shot blasters identified as #1 and 2, constructed in 1992, with a total maximum capacity of blasting 1,400 pounds of brake shoes per hour, utilizing one (1) baghouse (ID #1) for particulate control, exhausting through one (1) stack ID # 1.
- (b) One (1) brake liner grinding operation, consisting of four (4) grinders identified as # 1, 2, 3, and 4, constructed in 1992, with a total maximum grinding rate of 1,400 pounds per hour, all utilizing one (1) baghouse (ID #2) and a HEPA filter for particulate control, exhausting through one (1) stack ID #2.
- (c) One (1) brake liner chopping operation, consisting of three (3) deliner choppers, constructed in 1992, with a total maximum throughput capacity of 5,625 brake shoes per hour, utilizing one (1) baghouse (ID #3) for particulate control, exhausting through one (1) stack ID #3.

- (d) Two (2) dip tanks, identified as primary and secondary, constructed in 1992, each with a maximum throughput rate of 1.929 gallons per hour. The secondary dip tank is only used when the primary dip tank is not working.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six (6) million British thermal units (MMBtu) per hour, as follows:
 - (1) One (1) burnoff oven, constructed in 1992, with a maximum heat input rate of 0.75 MMBtu per hour, exhausting through stack ID # 7; and
 - (2) Three (3) bonding ovens, identified as #1, 2, and 3, each constructed in 1992, each with a maximum heat input rate of 0.5 MMBtu per hour, exhausting through stacks # 5, 4, and 6, respectively.
- (b) Vessel storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (e) Paved and unpaved roads and parking lots with public access.
- (f) One (1) propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 Permit No. 059-14886-00012 issued on June 26, 2000, and expires on June 26, 2005;
- (b) First Minor Source Modification No. 059-12475-00012, issued on September 21, 2000.

All relevant facility specific conditions from the previous Part 70 approvals are incorporated into this FESOP, with one exception. Section D.3 contained specific requirements applicable to the one (1) 57 cubic meter propane storage tank based on the conclusion that the tank, constructed in 1992, was subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.60.110, Subpart Kb). However, pursuant to 40 CFR 60.111b (d)(2) (Applicability), the subpart does not apply to pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. This storage tank contains liquified propane fuel at a pressure well in excess of 204.9 kPa and does not exhaust to the atmosphere (at least 250 psi, equivalent to about 1,702 kPa, based on ASME standards). Therefore, the requirements of Section D.3 are not included in this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on September 20, 2001. Additional information was received on January 22, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (three (3) pages).

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit (Note: It is recognized that Part 70 No. 059-9982-00012, issued on June 26, 2000, incorporates the requirements of 40 CFR 61.140, Subpart M, *National Emission Standard for Asbestos*, as applicable to this source. However, for purposes of establishing original applicability to 326 IAC 2-7, this table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous Part 70).

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Formaldehyde	less than 10
Phenol	less than 10
asbestos	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) the combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued Part 70 Permit No. 059-9982-00012 on June 26, 2000, has opted to make the transition to a FESOP source, rather than continue to operate under the Part 70 Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
dip tank	0.0	0.0	0.00	8.09	0.00	0.00	1.03
shot blasting operation (2 machines to baghouse ID#1)	14.14 ⁽¹⁾	14.14 ⁽¹⁾	0.00	0.00	0.00	0.00	4.99 (asbestos)
grinding operation (4 grinders to baghouse ID#2)	14.14 ⁽¹⁾	14.14 ⁽¹⁾	0.00	0.00	0.00	0.00	0.00
deliner chopping operation (3 choppers to baghouse ID#3)	17.20	17.20	0.00	0.00	0.00	0.00	4.99 (asbestos)
propane combustion units ⁽²⁾	0.06	0.06	0.02	0.08	0.20	1.51	negligible
Total After Issuance	45.54	45.54	0.02	8.17	0.20	2.18	11.01 (total)
1. PM emission rates (tons per year) reflect 326 IAC 6-3-2 allowable emission rates (lb/hr), extrapolated on an equivalent annual basis assuming 8,760 hours of operation, and PM10 conservatively set equal to PM. 2. Insignificant activity.							

County Attainment Status

The source is located in Hancock County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Hancock County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The 15,042 gallon propane storage tank, identified as #1, constructed in 1992, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.60.110, Subpart Kb). Pursuant to 40 CFR 60.111b (d)(2) (Applicability), Subpart Kb does not apply to pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. This storage tank contains liquified propane fuel at a pressure well in excess of 204.9 kPa and does not exhaust to the atmosphere (at least 250 psi, equivalent to about 1,702 kPa, based on ASME standards). Therefore, the requirements of this rule do not apply to this tank.

Therefore, there are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14-2-1, (40 CFR 61.140, Subpart M) because the lining of the brake shoes to be rebuilt, as received by the source, can contain asbestos. The source does not use asbestos containing brake linings during the assembly process for the rebuilt brake shoes. The following requirements of this subpart shall be met:
- (1) Each owner or operator shall discharge no visible emissions to the outside air from these operations or from any building or structure in which they are conducted.
 - (2) Monitor each potential source of asbestos emissions from visible emissions at least once a day.
 - (3) Inspect each air cleaning device at least once each week for proper operation.
 - (4) Maintain records of monitoring and inspections using a format similar to Figure 1 and 2 in 40 CFR 61.140, Subpart M.
 - (5) Furnish upon request and/or making available the records for inspection by OAQ.
 - (6) Retain a copy of all monitoring and inspection records for at least two years.
 - (7) Submit a copy of the monitoring records if visible emissions occurred during the report period.

The source will continue to comply with these requirements, which are contained in existing Part 70 No. 059-9982-00012, and will be placed into this FESOP approval.

- (c) The requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP), do not apply to this source for the propane storage tank, identified as #1, constructed in 1992, with a maximum storage capacity of 15,042 gallons (as an insignificant activity). On March 13, 2000, U.S. EPA issued a final rule amending Part 68 to add §68.126 (Exclusions), removing flammable substances used as fuel from the list of applicable substances. This included the removal of propane, which is used as fuel for the combustion units (as Insignificant Activities) at this source.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

This rule, determined to apply to the source under existing Part 70 Permit No. 059-9982-00012, issued on June 26, 2000, is no longer applicable to this FESOP since the source has total allowable PM less than 100 tons per year.

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

Pursuant to 326 IAC 2-2 and 40 CFR 52.21 (PSD), this source, constructed after 1980, is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. As a FESOP source, the total potential to emit of PM-10 shall be limited to less than 100 tons per year. Control technology and related compliance requirements for PM-10 (and asbestos) shall also limit to potential to emit PM to less the 100 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source is located in Hancock County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO_x, PM₁₀ (including fugitive emissions), or SO₂ in amounts at or exceeding one-hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-6 still do not apply to the source.

326 IAC 2-8 (FESOP Program)

Pursuant to this rule, the amount of PM-10 shall be limited to less than 100 tons per year, and single and combined HAPs shall still be limited to less than 10 and 25 tons per year, respectively. The source shall comply with the allowable PM-10 and asbestos (as single HAP and primary component to combined HAPs) emission limits specified at Conditions D.1.2 and D.1.3, along with the applicable control technology monitoring, record keeping and reporting requirements, pursuant to Section D.2 and 40 CFR Part 61.140, Subpart M, *National Emission Standard for Asbestos*. Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source. Compliance with these limitations shall also make the requirements of 326 IAC 2-2 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD), not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). No facilities with an uncontrolled PTE of 10 tons per year of any single HAP and 25 tons per year of the combination of HAPs have been constructed or reconstructed since July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to this source.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) emitted from the facilities listed below shall be limited as stated, based on the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Emission Unit/Activity	Process Weight Rate (lbs/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)	Controlled PM Emissions (lb/hr)
Pangborn shotblast operation (2 shot blasters) controlled by baghouse ID#1	1,400	3.23	1.91
Brake liner grinding operation (4 grinders) controlled by baghouse ID#2 & HEPA Filter	1,400	3.23	1.27
Deliner chopping operation (3 choppers) controlled by baghouse ID#3	1,875	3.93	3.18

PM emissions from these activities are in compliance with 326 IAC 6-3-2 by calculation (see Appendix A, page 3 of 3), and the source utilizes baghouses for particulate matter control on the emission units. The baghouses shall be in operation at all times the shot blasting, grinding, and deliner chopping facilities are in operation, in order to comply with this limit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at each of the dip tanks shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the dip tanks are in compliance with this requirement.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. Stationary vessels with capacities less than 39,000 gallons are only subject to the reporting and record keeping requirements of the rule. This source is located in Hancock County. Therefore, this rule is not applicable to this source.

Testing Requirements

Compliance testing is not required of this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the shot blasting, grinding and delining operations are controlled by baghouse and have emissions below the relevant allowable particulate matter emission rates.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The shot blasting operation (two (2) shot blasters, the brake liner grinding operation (four (4) grinders), and the deliner chopping operation (three (3) choppers) have applicable compliance monitoring conditions as specified below:

- (a) Visible emissions notations of the shot blasting operation; grinder operation; and deliner chopping operation baghouse stack exhausts ID Nos. 1, 2 and 3, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal.
- (b) The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the respective shot blasting, grinding, and deliner chopping operations, at least once per shift when the shot blasting; grinding; and chopping units are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the shot blasting operation (i.e., two (2) Pangborn shot blasters), the brake liner grinding operation (i.e., four (4) grinders), and the deliner chopping operation (i.e., 3 deliner choppers) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouses for the two (2) shot blasters, the four (4) grinders and the three (3) deliner choppers must operate properly to ensure compliance with 326 IAC 14-2, 40 CFR 61.140, Subpart M *National Emission Standard for Asbestos*, 326 IAC 6-3 (Process Operations), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this brake shoe rebuilding and assembly source shall be subject to the conditions of the attached proposed FESOP No.: 059-14886-00012.

Appendix A: Emission Calculations
LPG-Propane - Commercial Boilers
(Heat input capacity: > 0.3 MMBtu/hr and < 10 MMBtu/hr)

Page 1 of 3 TSD App A

Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 & Mohawk Rd., Fortville, IN 46040
FESOP No.: 059-14886-00012
Reviewer: Michael Hirtler / EVP
Date: January 22, 2002

Heat Input Capacity * Potential Throughput * SO₂ Emission factor = 0.10 x S
MMBtu/hr kgals/year S = Sulfur Content = 1.00 grains/100ft³

3.25

311.15

Emission Factor in lb/kgal	Pollutant					
	PM	PM10	SO ₂	NO _x	VOC	CO
	0.4	0.4	0.1 (0.10S)	14.0	0.5 **TOC value	1.9
Uncontrolled Potential to Emit (tons/yr)	0.06	0.06	0.02	2.18	0.08	0.30

*Includes three (3) bonding ovens respectively rated at 0.5, 0.5, and 1.5 MMBtu/hr, and one (1) burn-off oven rated at 0.75 MMBtu/hr.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-03-010-02)

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

Uncontrolled Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton (note: an afterburner is installed on Bondtech Oven #3 (rated at 1.5 MMBtu/hr) to control VOC and CO at an estimated 90% control; and a micro air-filter is used to control PM/PM10 from the Grigg Bonding Oven #1 (rated at 0.5 MMBtu/hr) at an estimated 98% control, however, only uncontrolled emissions are presented herein due to the low uncontrolled emission rates from these facilities, and since no allowable emission limitations will apply to the individual facilities.

**Appendix A: Emission Calculations
VOC, HAP and Particulate
From Surface Coating Operations**

Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 & Mohawk Rd., Fortville, IN 46040
FESOP No.: 059-14886-00012
Reviewer: Michael Hirtler / EVP
Date: November 20, 2001

Potential Uncontrolled Emissions:																	
Coating Material	Type of Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
<i>As Supplied - DIP TANK</i>																	
Rust Inhibitor (602-B1)	metal brake shoes	8.14	47.00%	0.00%	47.00%	0.00%	28.88%	0.482	(gal/hr)								
Acetone (non-photochemically reactive diluent)		6.51	100.00%	100.00%	0.00%	0.00%	32.11%	1.447	(gal/hr)								
<i>As Applied - DIP TANK</i>																	
Rust Inhibitor & Acetone Mixture		6.92	84.41%	70.58%	13.83%	0.00%	31.30%	1.929	(gal/hr)	0.96	0.96	1.84	44.28	8.08	0.00	3.06	100%
Total Uncontrolled Potential to Emit:												1.84	44.28	8.08	0.00		
Total Controlled Potential to Emit:										12-mos Input Usage Limit	Control Efficiency	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
										VOC	PM						
										100.00%	0.00%	0.00	0.00	8.08	0.00		

Methodology:

* Pursuant to 326 IAC 1-2-48, acetone is a nonphotochemically reactive hydrocarbon and the organic content is considered as water for compliance calculation purposes.
Coating "As Applied" computations based on ratio of coatings as 3 parts acetone to 1 part rust inhibitor.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Total = Sum of Worst Coatings per booth + Sum of all solvents used
Controlled VOC Emission Rate = Uncontrolled Emission Rate * (1 - VOC Input Limitation)
Controlled PM Emission Rate = Uncontrolled Emission Rate * (1 - Control Efficiency)

HAP Emission Calculations

Material	Density (Lb/Gal)	Gallons of Material per hour (gal/hr)	Weight % Phenol	Weight % Formaldehyde	Phenol Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Dip Tank (as applied)	6.92	1.929	1.471%	0.294%	0.86	0.17	1.03

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Process Emission Calculations
PM/PM10/HAP (as Asbestos)**

Company Name: D & D Brake Sales, Inc.
Address City IN Zip: State Road 234 & Mohawk Rd., Fortville, IN 46040
FESOP No.: 059-14886-00012
Reviewer: Michael Hirtler / EVP
Date: January 22, 2002

Emission Unit *	Outlet Grain	Control Device	Control *	Potential PM/PM10 Emission Rate				Process	326 IAC 6-3-2	Equivalent 326 IAC 6-3-2
Description	Loading (gr/acf)	Fan Flow Rate (acfm)	Efficiency (%)	Before Controls (lb/hr)	Before Controls (tons/yr)	After Controls (lb/hr)	After Controls (tons/yr)	Weight Rate (lb/hr)	PM Emission Rate (lb/hr)	PM Emission Rate (tons per year)
Pangborn Shotblast Machine #1 & 2 exhausting at 1 common baghouse ID#1	0.09	2,475	99.85%	1,272.86	5,575.11	1.91	8.36	1,400	3.23	14.14
Grinder #1, 2, 3 & 4 exhausting at 1 common baghouse ID #2	0.03	4,944	99.97%	4,237.71	18,561.19	1.27	5.57	1,400	3.23	14.14
Deliner Chopping Operation (3 choppers) exhausting at 1 common baghouse ID #3	0.10	3,708	99.85%	2,118.86	9,280.59	3.18	13.92	1,875	3.93	17.20
Total Potential to Emit PM/PM10:				7,629.43	33,416.90	6.36	27.85			45.48
Total Potential to Emit HAPs (as asbestos):**				551.06	2,413.63	0.32	1.39			4.55

Methodology:

* Each shotblast machine and each grinder is presented as a separately controlled facility; however, the two (2) shot blast machines are controlled by one (1) common baghouse (ID #1) and the four (4) grinders are controlled by one (1) common baghouse and HEPA filter (ID#2). These six (6) facilities are presented separately for purposes of demonstrating individual compliance with 326 IAC 6-3-2. The source shall limit the potential to emit from each process to the allowable emission rate as shown. Since total PM is assumed equal to PM10, compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable.

** Based on baghouse dust analysis using EPA Method 600/R-93/116 (i.e., Polarized Light Microscopy), test results were non-detectable for asbestos. However, based on engineering judgement, the source has requested an asbestos emission rate at 10 percent of the PM emissions for a conservative emission rate estimate. Asbestos is potentially emitted from the old brake shoe removal process, which does not include grinding that is performed for new brake shoes that do not contain asbestos. Asbestos emissions are limited pursuant to 40 CFR 61, Subpart M, National Emission Standard for Asbestos.

Potential Uncontrolled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs

Potential Controlled Emissions (tons/yr) = Outlet Loading (grains/acf) * Fan Flow Rate (acfm) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * (1 - Control Efficiency)

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c), Process Operations, for weight rates up to 60,000 lb/hr is determined using the following formula:

$$E = 4.1 * P^{0.67} \quad \text{where:} \quad E = \text{allowable PM emission rate (lb/hr)}$$

$$P = \text{process weight rate (tons/hr)}$$